

JUN 19 1995

CERTIFIED MAIL Z 203 223 012
RETURN RECEIPT REQUESTED

Douglas A. Niedt, President
Niedt Enterprises, Inc.
One Steelcote Square
St. Louis, Missouri 63103

Dear Mr. Niedt:

← **Re:** Termination of Administrative Order on Consent
EPA Docket No. VII-91-H-0025

The U.S. Environmental Protection Agency (EPA) has reviewed the "Reevaluation of Requirements" dated April 5, 1995, submitted by Steelcote Manufacturing Company (now known as Niedt Enterprises, Inc.), and Niedt Realty Company, as well as the analytic results and facility reports covering the last two years. As a result of such review, EPA grants your request to be released from further groundwater monitoring at the facility. In addition, the provisions of the RCRA Section 3013 Order are deemed satisfied and the Order is terminated.

Wells at the site must be abandoned in accordance with Missouri requirements. A copy of these requirements, which are found at 10 CSR 23-4.080, is enclosed. Please submit a plan for well abandonment to EPA for review and approval. It is requested that Cynthia Hutchison of my staff be given at least fourteen (14) days prior notice before field implementation of well abandonment so that a representative of EPA may be present.



R00094678
RCRA Records Center

ART/RCRA/RCOM:HUTCHISON:ns:7305:06/13/95:f:\Release
RCOM CNSL GEOL RCOM ARTD
HUTCHISON HOFFER GABBERT DOYLE SPRATLIN

CH
6/14/95

Datt
6/14/95

up
6/14/95

2/2/95
6/15/95

KAT
FOR
WAS
6/16/95

If you have any questions, please call Cynthia Hutchison at
(913) 551-7478.

Sincerely yours,

William A. Spratlin
Director
Air, RCRA, Toxics Division

Enclosure

cc: Alphonse McMahon, Esq.
Donald J. McQueen, VP

bcc: D. Hoefer, CNSL
H. Gabbert, GEOL

10 CSR 23-4.060 Plugging of Monitoring Wells

PURPOSE: *This rule sets standards for the plugging of monitoring wells.*

(1) A monitoring well that is to be plugged shall meet the following minimum requirements:

(A) All pumps, sampling equipment, debris or other substances must be removed that would interfere with the proper plugging of the well;

(B) All protective casing, riser pipe and well screen must be removed from the borehole, if possible, unless approved by the division. Because the primary purpose of well plugging is to eliminate vertical fluid migration along the borehole, the preferred method of plugging involves casing and riser pipe removal. If, when removing the casing the borehole begins to collapse, grout must be simultaneously emplaced while the casing is removed to ensure a proper seal. In certain situations, the casing or riser pipe must be drilled out if it can not be removed before the well is plugged. These situations will be determined on a case-by-case basis by the division. When casing is not required to be removed or if after attempting to remove the casing, it is not possible to remove it, then a hole must be dug around the casing three feet (3') deep and the casing and riser pipe cut off at that depth;

(C) The well must be filled from bottom to top with grout. 10 CSR 23-4.060 (11) sets standards for grout types that may be used when plugging monitoring wells; and

(D) If bentonite grout is used, after the grout is fully cured, check for settlement and top off if necessary. Fill with soil and compact the upper two feet (2') of hole or pave. The purpose of the compacted soil is to ensure that dehydration of the bentonite grout does not occur over time. If cement-slurry grout is used, fill the upper two feet (2') with soil or pave. Slight mounding over the well is recommended to prevent water from standing in the immediate area of the well.

(2) The plugging or complete excavation of all monitoring wells must be reported on a registration report form supplied by the division. These forms must be submitted, along with the fee, within sixty (60) days of the plugging (see 10 CSR 23-2 for applicable fees). If the review of the registration report form shows that the well has been plugged according to the rules, a registration number will be issued and sent to the well owner. The registration number indicates that the well was plugged according to the standards set out in the rules. When

field screening type of temporary wells are drilled, usually multiple installations per monitoring site are used. All temporary wells per monitoring site may be reported on one (1) registration report form if they are all plugged the same way and only one registration fee is required per site.

(3) Monitoring wells must be plugged by a permitted monitoring well installation contractor.

(4) Material used to plug monitoring wells must be compatible with any contaminants in the well so that the plugging action of the grout is not destroyed by any chemical reactions that may take place in the borehole environment.

(5) Monitoring wells less than ten feet (10') in depth must be plugged by returning uncontaminated native material or grout into the hole it was taken from. No reporting is required for these wells.

(6) Temporary monitoring wells greater than ten feet (10') in depth must be plugged by removing any temporary pipe and filling the well from total depth to ten feet (10') from the surface with approved grout, with the remainder of the well filled with uncontaminated compacted native material or grout.

*Auth: sections 256.606, 256.615 and 256.623, RSMo (Cum. Supp. 1991). * Emergency rule filed Nov. 16, 1993, effective Dec. 11, 1993, expired April 9, 1994. Original ruled filed Aug. 17, 1993, effective March 10, 1994. Amended: Filed July 13, 1994, effective January 29, 1995. *Original authority: 256.606 and 256.615, RSMo (1991) and 256.623, RSMo (1985), amended 1991.*

Z 203 223 012



Receipt for Certified Mail

No Insurance Coverage Provided
Do not use for International Mail
(See Reverse)

PS Form 3800, March 1993

Sent to Douglas A. Niedt, President	
Niedt Enterprises, Inc.	
Street and No. One Steelcote Square	
P.O., State and ZIP Code St. Louis, MO 63103	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	

IN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

1. ☐ Addressee's Address
2. ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

Douglas A. Niedt, President
Niedt Enterprises, Inc.
One Steelcote Square
St. Louis, Mo 63103

4a. Article Number

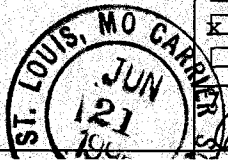
Z 203 223 012

4b. Service Type

- | | |
|---|---|
| <input type="checkbox"/> Registered | <input type="checkbox"/> Insured |
| <input checked="" type="checkbox"/> Certified | <input type="checkbox"/> COD |
| <input type="checkbox"/> Express Mail | <input type="checkbox"/> Return Receipt for Merchandise |

Date of Delivery

6/21/95



you for using Return Receipt Service.

**STICK POSTAGE STAMPS TO ARTICLE TO COVER FIRST CLASS POSTAGE,
CERTIFIED MAIL FEE, AND CHARGES FOR ANY SELECTED OPTIONAL SERVICES (see front).**

1. If you want this receipt postmarked, stick the gummed stub to the right of the return address leaving the receipt attached and present the article at a post office service window or hand it to your rural carrier (no extra charge).
2. If you do not want this receipt postmarked, stick the gummed stub to the right of the return address of the article, date, detach and retain the receipt, and mail the article.
3. If you want a return receipt, write the certified mail number and your name and address on a return receipt card, Form 3811, and attach it to the front of the article by means of the gummed ends if space permits. Otherwise, affix to back of article. Endorse front of article **RETURN RECEIPT REQUESTED** adjacent to the number.
4. If you want delivery restricted to the addressee, or to an authorized agent of the addressee, endorse **RESTRICTED DELIVERY** on the front of the article.
5. Enter fees for the services requested in the appropriate spaces on the front of this receipt. If return receipt is requested, check the applicable blocks in item 1 of Form 3811.
6. Save this receipt and present it if you make inquiry.

105603-93-B-0218

PS Form 3800, March 1993 (Reverse)

UNITED STATES POSTAL SERVICE

Official Business

RECEIVED

JUN 23 1995

RCOM SECTION



PENALTY FOR PRIVATE
USE TO AVOID PAYMENT
OF POSTAGE, \$300



Print your name, address and ZIP Code here

ATTN: C.
Hutchison, RCOM

Environmental Protection Agency
WSTM/RCRA/CIEPL
726 Minnesota Avenue
Kansas City, Kansas 66101